

SUMMARY OF THE PROFICIENCY TESTING COMMITTEE MEETING APRIL 19-20, 1999

The Proficiency Testing Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met on Monday and Tuesday, April 19-20, 1999, in Norfolk, VA. The meeting was led by its Chair, Ms. Anne Rhyne of the Texas Natural Resource Conservation Commission. A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The principle purpose of the meeting was to address comments, discuss unresolved issues, and to prepare for the NELAC V Meeting in June, 1999.*

INTRODUCTION

Ms. Rhyne began the meeting by reviewing the agenda for the meeting. Invited guests included Mr. Bob Graves from EPA and Ms. Reenie Parris from NIST. Ms. Parris joined the meeting by telephone in order to update the committee on the status of NIST's accreditation program for PT Providers and to answer questions.

After the NELAC IV interim meeting, comments on Chapter 2 were received from the State of Oregon DEQ, Department of Energy, Environmental Testing Laboratories of Dow Chemical, New Jersey DEP, Mr. Donovan Porterfield, Virginia NELAC Workgroup, EPA Region 2, Department of Defense, and Lancaster Laboratories. Committee members reviewed these comments and presented responses and/or suggested changes for their assigned sections of Chapter 2. The primary changes to the chapter and related discussions are summarized below.

HIGHLIGHTS OF DISCUSSIONS

Editorial Changes

Editorial changes and clarifications were made throughout Chapter 2 and its appendices, where necessary. Some of these changes are:

- modifications for consistent and correct use of "NELAC" (e.g., standards or requirements) and "NELAP" (e.g., accreditation or approvals)
- addition of the term "to obtain or maintain" to clarify references to the accreditation sought by laboratories
- addition of "PT" before "fields of testing," to eliminate any ambiguity about the use of the term in Chapter 2 compared to other parts of the standards

External Requirements from the National Standards

One of the comments, from the Department of Defense, recommended that NELAC provide the applicable requirements of the "National Standard for Water Proficiency Testing Studies, Criteria Document" in the NELAC standards. The committee discussed options on how to clarify the external requirements for PT Providers. They agreed to write a FAQ that would provide instructions on how to obtain a copy of the National Standards. Another suggestion was to put a

table in the appendices which would list analytes, concentration ranges, references, and whether or not the analyte was a WS/WP analyte. The committee decided that because this list was subject to change at different times from the standards, that it should be made available from the committee chair, rather than included in the PT standards.

Report: Number of Participating Labs and Those Not Scoring Acceptable

The Virginia NELAC Workgroup and New Jersey DEQ requested that laboratories be provided with any information which might indicate a problem with the PT samples in their studies. For example, they wanted to know the total number of participating laboratories and the number of laboratories not scoring acceptable for a particular study. The committee agreed to add language to Section 2.6 which stipulates that upon request by either the Primary Accrediting Authorities or laboratories, the PT Provider shall make available a report listing this information.

Withdrawal from PT Studies

It was questioned whether laboratories can opt out of PT studies, and what the time frame would be for doing this. The committee members agreed that both the PT Provider and the Primary Accrediting Authority should be notified of the laboratory's decision to withdraw from the study, and the notification must occur before the closing date of the PT study. A new Section 2.7.7 will be added to stipulate this.

National Standards for Solid and Hazardous Waste PTs

Because it appears that neither the Office of Solid Waste or NIST will issue a criteria document for solid waste, it is a goal of the Solid Waste Subcommittee to do this. Mr. Matt Caruso said that the subcommittee will try to put together a criteria document within the next two to three months. After the criteria document is prepared, the committee will focus on implementation. It is currently unknown who will serve as the PTOB/PTPA for solid waste.

PT Sample Composition (Interdependent vs. Non-interdependent)

The committee discussed various options for PT sample composition and how to manage interdependent analytes. Through the course of this discussion, they concluded that a decision needed to be made on how to accredit laboratories. There were three main proposals (see table below) which the committee discussed and then took vote on.

Proposal 1	Proposal 2 *	Proposal 3
To be accredited, the lab must pass 80% of interdependent analytes.	Initial and continuing accreditation is done on an analyte-by-analyte basis.	(No change to standard.) To be accredited, the lab must pass 80% of interdependent analytes. Continuing accreditation is done on an analyte-by-analyte basis.
If a lab fails > 20%, it loses accreditation.		

* Proposal 2 was selected by committee vote.

Because labs are certified on an analyte-by-analyte basis, it was agreed that PTs should be on the same basis (even though certification by method is easier). Modifications to the standards were made in accordance with the decision to accredit on an analyte-by-analyte basis. This includes the deletion of language describing pass/fail criteria and interdependent/non-interdependent analyte PT samples in Appendix C. Section B.4.0 and B.4.1 (Sample Formulation) was moved up to Section B.1 and B.1.1. A new Section B.1.2 (PT Sample Composition) was added to define the criteria for PT sample preparation.

Additional Matrices/Analytes

A new Section C.4.1 was added to describe the conditions for adding matrices/analytes to the NELAC PT Fields of Testing. This may be done at the request of any AA, EPA Program Office, or PTOB/PTPA-approved PT Provider. Section C.4.1 also describes development and review of laboratory acceptance limits by the PT Committee.

Radiochemistry

Mr. Chuck Wibby provided an update on the radiochemistry appendix. He said that there are some issues with the radiochemistry standards. EPA-Las Vegas proposed that the NELAC standards be the same as the National Standards. However, the committee contends that the NELAC standards need to be more flexible than the proposed National Standards. The Radiochemistry Subcommittee will move forward with developing the appendix for Chapter 2, minimizing differences, but expecting that there will be some. Mr. Wibby said that the appendix will not be presented for vote at NELAC V unless there is indication of overwhelming support.

PT Review

There have been several comments about the need for PT review. Because NIST will not invalidate PT samples (they assess the competency of PT Providers), another mechanism for PT review is needed. The PT Committee has discussed options for “stopping the clock” so that laboratories will not lose accreditation due to a sample of suspect quality. The mechanism preferred by the committee is for the AA to submit a complaint to the Accrediting Authority Review Board (AARB). Ms. Anne Rhyne will work on the details to add language to Section 2.7.5.

SELECTION OF NEW MEMBERS

Several candidates were nominated for membership in the PT Committee. Committee members voted to fill the two open positions (government member and private member). An alternate for each committee position was chosen in case the primary was unable to accept membership. Ms. Rhyne will contact the selected new members to see if they accept the committee positions.

NIST UPDATE

Ms. Reenie Parris provided an update of NIST activities. She said that Quality Systems is still in the adequacy review process. Assessor training is finished. When asked how deficiencies will be handled, Ms. Parris replied that if the deficiency is minor, it will not prevent accreditation (as long as the laboratory works on it). If the deficiency affects the validity of studies, then it must be resolved before a laboratory can be accredited. Deficiencies will not hold up the time schedule for accrediting the first class. As the deficiencies are resolved, accreditation can be issued individually for those not included in the first class.

MISCELLANEOUS

There were no changes to Appendix E (Microbiology). Minor comments were received on the appendix for Environmental Toxicology; Dr. Faust Parker said that it will be ready for vote at NELAC V. The appendix for Air is still undergoing revision, but may be available at NELAC V.

**ACTION ITEMS
PROFICIENCY TESTING COMMITTEE MEETING
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Item No.	Action	Date to be Completed
1.	Write a FAQ that would provide instructions on how to obtain a copy of the National Standards.	
2.	Develop a table listing analytes, concentration ranges, references, and whether or not the analyte was a WS/WP analyte (to be available from the PT Committee Chair).	
3.	Develop criteria document for solid waste.	
4.	Finalize selection of new PT Committee members (contact new members to see if they accept).	5/12/99
5.	Prepare language on PT Review (function of AARB) to add to Section 2.7.5.	

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PROFICIENCY TESTING COMMITTEE MEETING
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